

21 Q. All right. Do you know anything that he has done with
22 respect to Sean Williams at all?

23 A. Specifically him?

24 Q. Yeah.

25 A. I do not know. That's not my job to know, so I would say

H. A.

DIRECT - RADER

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1 that would be something my lawyers would know. I don't
2 specifically know that information, those details about
3 him.

H. A.

DIRECT - RADER

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5 Q. All right. What is the basis for you to say that Kevin
6 Peters was involved in any extortion involving Sean
7 Williams, that individual?
8 A. That is not my job to explain. That is my lawyers' job.

H. A.

DIRECT - RADER

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8 Q. So you don't -- you can't name a single witness today.

9 Can you provide a single document today?

10 MS. KRAMER: Objection.

11 A. That is not my responsibility. It is the responsibility
12 of my lawyers.

H. A.

DIRECT - RADER

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18 Q. And so that's the question. What facts do you know of
19 that are not in the filing that you claim that any of
20 these individuals, not just some broad scattershot Johnson
21 City Police Department, but any of these individuals, can
22 you tell me any facts that are not in your filing?

23 MS. KRAMER: Objection.

24 A. I cannot tell you any facts that are not in the file.
25 That is the responsibility of my lawyers as well as other

H. A.

DIRECT - RADER

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1 Defendants in this case.

H. A.

DIRECT - RADER

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C E R T I F I C A T E

I, Rebecca Overbey, Licensed Court Reporter in and for the State of Tennessee, do hereby certify that the foregoing deposition of H. A. was taken at the time and place and for the purpose as stated in the Caption; that the witness was duly sworn by me before deposing; that the said deposition was recorded electronically and was later transcribed to typewriting, using computer technology; and that the foregoing is a true and accurate transcript of the proceedings to the best of my knowledge, ability and understanding.

WITNESS my hand and official seal at my office in Kingsport (Sullivan County) Tennessee on this the 3rd day of June, 2024.



Rebecca Overbey
Rebecca Overbey
LICENSED COURT REPORTER
State of Tennessee
LCR #078

My License Expires:

June 30, 2026

CERTIFIED ONLY IF AFFIXED SEAL IS GREEN